



December 18, 2014

Via ECF

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, NY 10007

Re: Greenbery v. Hudson Bay Master Fund Ltd. et al. 14-cv-05226

Your Honor:

This firm represents Nominal Defendant, WPCS International Incorporated (“WPCS”) in the above-captioned action. We write to move this Court for an extension of time to file an answer to Plaintiff’s Amended Complaint.

Defendants Hudson Bay Master, LTD., Iroquois Master Fund LTD., and American Capital Management LLC have filed motions to dismiss in the above-captioned action. WPCS has not joined either Plaintiff or Defendants in briefing these motions, and so, WPCS is due to respond to Plaintiff’s Amended Complaint on December 19, 2014. It would be more efficient for WPCS to respond to the Amended Complaint on the same date that any defendant is required to do so.

We have conferred with Plaintiff’s counsel and he has consented to an extension of time to respond to the Amended Complaint as set forth in the enclosed stipulation. This is the first request for this relief that WPCS has made to this Court.

WPCS thanks the Court for its attention in this regard.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matthew P. Canini'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Matthew P. Canini

Encl.

cc: all parties via ECF